

Montana Chapter of the American Fisheries Society

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January 9, 2006

Honourable Gordon Campbell
Premier of British Columbia
PO Box 9041, STN PROV GOVT
Victoria, BC
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Canada

Honorable Governor Schweitzer
Governor of Montana
Office of the Governor, State Capitol
PO Box 200801
Helena, MT 59620
United States of America

Dear Premier Campbell and Governor Schweitzer:

The American Fisheries Society, the oldest society of natural resources professionals in North America, was organized in 1870. The Montana Chapter of the American Fisheries Society (MCAFS) was chartered in 1967, and consists of over 300 members statewide. Among the objectives of the Society are conservation, development and wise use of fisheries, promotion of educational, scientific and technological development and advancement of all branches of fisheries science and practice, and exchange and dissemination of knowledge about fish, fisheries and related subjects. As such, we are keenly interested in the conservation and protection of native fish and aquatic species and the habitats on which they depend for growth, survival, and persistence.

The MCAFS would like to provide comment and recommendations on the proposed gas and oil development in the headwaters of the British Columbia (B.C.) portions of the North Fork Flathead River and Kootenai River (i.e., Wigwam River and Lodgepole Creek) drainages. Recently, the Cline Mining Company released a plan to develop an open-pit mine in the headwaters area of the Flathead River (i.e., Foisey Creek), a coal washing plant in the headwaters area of Lodgepole Creek (a tributary of the Elk River in the Kootenay/Kootenai River watershed), and a 32-kilometer road haul to a rail terminal adjacent to the Elk River at Morrissey, B.C. All of these developments will likely impact critical fish and wildlife habitat in the Flathead River headwaters and tributaries of the Elk River. Additionally, we are concerned

that the Province attempted to auction nearly 50,000 acres for coalbed methane (CBM) in April and July 2004.

Protecting the North Fork Flathead and upper Kootenai River watersheds from gas and oil development in both the U.S. and Canada will conserve this unique ecosystem and its large tracts of contiguous aquatic and terrestrial habitats. The North Fork Flathead River, which flows across the US-Canadian border just over the divide from Waterton Lakes National Park, is recognized as a regional stronghold for migratory bull trout and westslope cutthroat trout. Studies have shown that the majority of spawning and rearing for Flathead River populations of each species occurs in the upper reaches of the Flathead River in Montana and B.C. For example, in 2003 the B.C. portion of the Flathead basin supported approximately 55% of the bull trout spawning population in the North Fork Flathead River. A sparse human population, limited development and high biodiversity make the North Fork Flathead River one of the most intact and unique watersheds within the Rocky Mountains. Protection of critical habitat throughout the entire Flathead River system, including the headwaters in Canada, is imperative to the persistence of native trout in the Flathead River drainage.

The best available scientific information suggests that the energy development slated for these areas pose a serious threat to the long-term persistence and integrity of fish populations and critical habitats. For example, CBM development may negatively affect water quality by changing many processes that aquatic organisms have evolved with over thousands of years, including the timing and quantity of stream flows (due to road building and extraction), rates of sedimentation, as well as deleteriously influencing concentrations of salts, water temperatures, and water chemistry. CBM may also cause accidental spills of fuels or drilling fluids. The foremost concerns are the impacts of CBM product water discharged into streams or other surface waters. Such discharges have been found to be highly saline, and may contain a variety of toxic substances. The effect of lowering aquifers through pumping can also deplete late season streamflows, which are critical for fall spawning populations of bull trout. We are not aware of any gas or oil development project that has not negatively impacted water quality and fish and wildlife populations. For example, high levels of selenium have been detected in cutthroat trout downstream of coal and gold mines in the Elk River Valley, and these impacts may extend downriver to Lake Koocanusa, which supports a world-renowned transboundary bull trout fishery.

The MCAFS would like to assist the British Columbia Environmental Assessment Office in defining the terms of reference for any environmental assessment conducted regarding proposed mining projects.

We recommend that the United States and Canada cooperatively collect baseline data to assess the potential impacts of mining on our shared natural resources. A comprehensive, watershed-level baseline assessment of water, fish and wildlife is the best approach, given all the unknowns about impacts to aquatic communities, such as the quality and quantity of discharge waters, salt toxicities, recipient stream hydrology, and pattern of development across the landscape. Collection of baseline environmental data would allow the responsible agencies to evaluate the effects of development on existing land uses and natural and cultural resources, and through this process devise strategies to prevent or reduce the detrimental effects of future development.

Many studies have shown that it is imperative that surface and sub-surface waters be assessed prior to development and monitored thereafter with a statistically meaningful and defensible

monitoring program to assess potential impacts to water quality, aquatic and terrestrial organisms (biota), stream hydrology, habitat conditions, and riparian function. Water management plans should always develop the least harmful disposal methods, such as reinjection technology, to ensure that discharged CBM product water does not threaten aquatic resources. Any development plan should address the rate and potential for cumulative effects of multiple wells and road development across the landscape. Thus, we recommend that baseline data be collected for at least four years, and that a moratorium be placed on further development until the data are collected. We also recommend that long-term studies take place for at least 15 to 20 years in the basin, similar to the extensive long-term studies in Montana.

Transboundary fisheries populations support a valued cultural and economic heritage in Canada and the United States. We encourage your governments to carefully evaluate the potential impacts of gas and oil development on water quality and quantity, aquatic biota, and critical habitats. These considerations should include evaluating not only natural resource-based values, but also socioeconomic aspects that include both short-term and long-term costs and benefits. The value derived from protecting key ecosystem processes will far outweigh short-term monetary gains from shortsighted resource extraction that will scar the landscape and its ecosystem indefinitely.

In summary, due to the inevitable impacts that industries such as CBM production and open-pit coal mining have on aquatic life, the apparent lack of adequate baseline monitoring data, and the uniqueness of the Flathead Basin Ecosystem (e.g., Crown of the Continent), we recommend that these areas be protected under an International Conservation Zone for the Transboundary Flathead River Valley to protect existing water, wildlife, and wilderness values. This conservation program should include scientific assessments for designing and implementing an international conservation zone in the transboundary Flathead. We believe that this approach will help protect, conserve and enhance our shared environment for the benefit of current and future generations. However, if this approach is not implemented, we urge your governments, at a minimum, conduct a comprehensive, watershed-level baseline and long-term assessment of water, fish and wildlife.

Human development and resource extraction continue to expand into remote areas and will impact fish and wildlife resources. Decisions made today represent a unique and irreversible opportunity to sustain our natural heritage for future generations. We urge both the United States and Canada to pursue protection of these critical areas. Thank you for considering our recommendations and the value of these international fisheries during future deliberations regarding the future of these unique ecosystems.

Sincerely,

A handwritten signature in dark ink, reading "Clint Muhlfeld" with a long, sweeping flourish extending to the right.

Clint Muhlfeld
Past-President MCAFS

Cc:

The Honourable Stephen Dion
The Honourable Dennis Schornack
The Honorable Herb Gray
Joan Hesketh

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